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7 *Attorney for Plaintiff*
8 *Michael Delgado*

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 MICHAEL DELGADO, an individual;

CASE NO.: 2:18-cv-00964-JAD-GWF

13 Plaintiff,

14 v.

15 ARCADIA, INC., a California corporation; and
16 DOES 1 through 100, inclusive;

17 Defendants.

18 **STIPULATION AND ORDER TO
EXTEND DEADLINE TO FILE
RESPONSE TO DEFENDANT'S MOTION
FOR PARTIAL DISMISSAL OF
PLAINTIFF'S AMENDED COMPLAINT
[DKT. 14] AND DEADLINE FOR
DEFENDANT'S REPLY THERETO**

19 **(SECOND REQUEST)¹**

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27 ¹ A previous request was made on August 27, 2018 in the Stipulation and Order to Extend Deadline to File Response to
28 Defendant's Motion for Partial Dismissal of Plaintiff's Amended Complaint and Deadline for Defendant's Reply Thereto
(Dkt. 17) and on August 27, 2018 said request was denied without prejudice (Dkt. 18) for failing to comply with Local
Rule IA 6-1.

1 Defendant's Motion for Partial Dismissal of Plaintiff's Amended Complaint was filed on
2 August 14, 2018. The Court has set a hearing on Defendant's Motion for Partial Dismissal of
3 Plaintiff's Amended Complaint for October 1, 2018. The parties hereby stipulate and respectfully
4 request that the Court extend the deadline for Plaintiff to respond to Defendant's Motion for Partial
5 Dismissal of Plaintiff's Amended Complaint (Dkt. 14) from August 28, 2018 to **September 5, 2018**.
6 The parties hereby also stipulate and respectfully request that the Court extend the deadline for
7 Defendant's Reply in Support of its Motion for Partial Dismissal of Plaintiff's Amended Complaint
8 through and including **September 19, 2018**. The extension on Plaintiff's response is sought based
9 upon the work and personal schedule of counsel for Plaintiff and conflicting deadlines that they have
10 in other matters. The extension on the deadline for Defendant's Reply brief is being sought because
11 of a change in Defendant's counsel's primary client contact with Defendant stemming from a
12 retirement that is expected to take place close in time to when Defendant's Reply brief would
13 ordinarily be due based upon the extension being sought by Plaintiff. This request is being made in
14 good faith and not for any purposes of delay.

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1 This is the parties' second request for an extension of time on the deadline for Plaintiff's
2 Response to Defendant's Motion for Partial Dismissal of Plaintiff's Amended Complaint and on
3 Defendant's Reply in support of that motion. A previous request was made on August 27, 2018 in
4 the Stipulation and Order to Extend Deadline to File Response to Defendant's Motion for Partial
5 Dismissal of Plaintiff's Amended Complaint and Deadline for Defendant's Reply Thereto (Dkt. 17)
6 and on August 27, 2018 said request was denied without prejudice (Dkt. 18) for failing to comply
7 with Local Rule IA 6-1

8 DATED this 28th day of August 2018.

9 **JONES LOVELOCK**

10 /s/ Nicole E. Lovelock, Esq.
11 Justin C. Jones, Esq.
12 Nevada State Bar No. 8519
13 Nicole Lovelock, Esq.
14 Nevada State Bar No. 11187
15 400 S. 4th St., Ste. 500
16 Las Vegas, Nevada 89101

17 *Attorneys for Plaintiff Michael Delgado*

8 DATED this 28th day of August 2018.

9 **LITTLER MENDELSON PC**

10 /s/ Timothy W. Roehrs, Esq.
11 Timothy W. Roehrs, Esq.
12 Nevada State Bar No. 9668
13 Montgomery Y. Paek, Esq.
14 Nevada Bar No. 10176
15 3960 Howard Hughes Parkway, Suite 300
16 Las Vegas, Nevada 89169

17 *Attorneys for Defendant Arcadia, Inc.*

18 **IT IS SO ORDERED:**

19 
20 UNITED STATES DISTRICT JUDGE
21 Dated: August 30, 2018.

22 Respectfully Submitted By:
23 **JONES LOVELOCK**

24 /s/ Nicole E. Lovelock, Esq.
25 Justin C. Jones, Esq.
26 Nevada State Bar No. 8519
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31 *Attorneys for Plaintiff Michael Delgado*